

# EXHIBIT 2

## to Memo iso Motion to Compel Production

# CLA

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December 21, 2012

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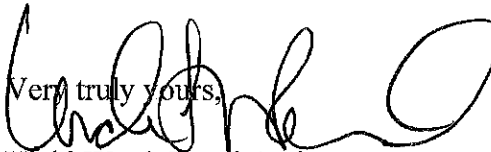
RE: Mark F. Guimond and Kallie A. Guimond, et al v. Toyota  
Motor Credit Corporation  
Civil Action No: 3:12-cv-00606-JAG

Dear Ladies/Gentlemen:

Attached hereto please find the following:

1. Plaintiffs' Objections to First Requests for Production of Documents;

Thank you for your cooperation and assistance herein, I remain

Very truly yours,  
  
Vicki Ward, Legal Assistant  
to Leonard A. Bennett

LAB:vlw  
Enclosure

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**MARK F. GUIMOND and KALLIE A.  
GUIMOND, on behalf of themselves and  
others similarly situated,**

**Plaintiffs,**

**v.**

**TOYOTA MOTOR CREDIT  
CORPORATION,**

**Defendant.**

**C.A. No. 3:12-cv-00606-JAG**

**PLAINTIFFS' OBJECTIONS TO  
FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS**

Comes now, the Plaintiffs, by counsel, and in response to Defendant's First Set of Requests for Production of Documents, state as follows:

**REQUESTS FOR PRODUCTION**

**Overview**

The parties have agreed that neither Plaintiffs' nor Defendants are requesting production of information or documents that are:

- (a) Communications between Plaintiff or Defendant and their counsel regarding this litigation or;
- (b) Document generated by counsel for Plaintiffs' or Defendant in this litigation.

1. All documents relating to the lawsuit against Equifax alleged in paragraph 5 of the FAC.

***RESPONSE: Objection –***

(a) *The documents requested are subject to the mediation privilege and the work product privilege. Pursuant to Fed.R.Civ.P. 26(b)(5), Plaintiff lists the following:*

- *Settlement Agreement between Plaintiff and Equifax;*
- *Settlement communications between Plaintiff and/or his counsel (in that case) and attorneys for Equifax;*
- *Communications between the Plaintiff and his attorney in that case;*

(b) *Plaintiff also objects as the request seeks discovery of documents with no relevance to this case that could not plausibly lead to the discovery of relevant evidence in this case. Plaintiff's counsel has asked of Defendant's counsel on multiple occasions for an explanation as to what relevance or potential use Defendant could obtain to such documents. Defendant's counsel has refused to offer any reasonable explanation. Accordingly, the information sought is beyond the scope of discovery.*

(c) *The settlement agreement with Equifax is negotiated as confidential. Plaintiffs' counsel has asked Equifax's counsel if it will waive such position and Equifax has refused.*

2. All documents relating to the allegation in paragraph 5 of the FAC that Mr. Guimond's credit report was "taken offline or frozen by Equifax."

**RESPONSERESPONSE: Objection –**

(a) *The documents requested are subject to the mediation privilege and the work product privilege. Pursuant to Fed.R.Civ.P. 26(b)(5), Plaintiff lists the following:*

- *Settlement Agreement between Plaintiff and Equifax;*
- *Settlement communications between Plaintiff and/or his counsel (in that case) and attorneys for Equifax;*

- *Communications between the Plaintiff and his attorney in that case;*

*(b) Plaintiff also objects as the request seeks discovery of documents with no relevance to this case that could not plausibly lead to the discovery of relevant evidence in this case. Plaintiff's counsel has asked of Defendant's counsel on multiple occasions for an explanation as to what relevance or potential use Defendant could obtain to such documents. Defendant's counsel has refused to offer any reasonable explanation. Accordingly, the information sought is beyond the scope of discovery.*

*(c) The settlement agreement with Equifax is negotiated as confidential. Plaintiffs' counsel has asked Equifax's counsel if it will waive such position and Equifax has refused.*

**MARK F. GUIMOND and  
KALLIE A. GUIMOND,**

On their own behalf and behalf of all  
others similarly situated

By

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*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true copy of the foregoing has been sent by first class U.S. Mail, postage prepaid and via e-mail on this 21st day of December, 2012 to the following:

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Of Counsel